

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

AUG 28 AM 11:16

U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

TAMMY K. LACQUA,

Defendant.

) INDICTMENT

)

)

)

)

)

)

)

)

CASE NO. 1:18 CR 485
Title 18, United States Code, Sections 1343.

JUDGE BOYKO

GENERAL ALLEGATIONS

At all times material and relevant to this Indictment:

1. C.C. Mitchell Supply Company, Inc. ("CCM") was a wholesale distributor of major appliances and operated its business in Broadview Heights, Ohio.
2. Defendant TAMMY K. LACQUA ("LACQUA") was an employee of CCM and held the position of Chief Financial Officer ("CFO") from approximately March 2013 through in or around April 2017.
3. As CCM's CFO, LACQUA's responsibilities included managing the accounts payable for CCM, preparing financial records and statements, and managing CCM's budgets and payroll.
4. CCM held accounts at Huntington National Bank. The deposits of this bank were insured by the Federal Deposit Insurance Corporation ("FDIC"), a federal government agency that insured bank deposits against substantial losses with the two-fold aim of preventing a bank's collapse and instilling public confidence in the nation's banking system.

COUNTS 1-6

(Wire Fraud, in violation of 18 U.S.C. § 1343)

The Grand Jury charges:

5. Paragraphs 1 through 4 of this Indictment are realleged and incorporated by reference as if set forth herein.

6. From in or around December 2013, and continuing through in or around March 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant TAMMY K. LACQUA devised and intended to devise a scheme and artifice to defraud her employer, C.C. Mitchell Supply Company, Inc., to obtain money and property by means of false and fraudulent pretenses, representations, and promises as set forth below.

7. Defendant LACQUA fraudulently transferred funds from CCM's Operating Account x6962 to her personal credit card accounts at Discover 35 times for a total of \$394,349.

8. Defendant LACQUA fraudulently transferred funds from CCM's Operating Account x6962 to her personal credit card account at Citibank 27 times for a total of \$374,146.

9. Defendant LACQUA fraudulently transferred funds from CCM's Operating Account x6962 to her personal credit card accounts at Chase 9 times for a total of \$57,141.

10. As a result of Defendant LACQUA's fraudulently transferred funds from CCM's Operating Account x6962 to her personal credit card accounts, CCM suffered a loss of approximately \$825,636.

11. On or about each of the following dates, Defendant LACQUA, for the purpose of executing and attempting to execute the scheme and artifice to defraud caused to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures and sounds, to wit: electronic online payment transfers from CCM's operating bank accounts held at Huntington National Bank to the personal credit card companies in the following names:

<u>Count</u>	<u>Date</u>	<u>Sent From</u>	<u>Source Bank</u>	<u>Wired to Account Name</u>	<u>Amount</u>
1	07/22/2014	CCM Operating Acct x6962	Huntington National Bank Columbus, Ohio	LACQUA Citibank Acct x9439 Louisville, Kentucky	\$18,500.00
2	11/25/2014	CCM Operating Acct x6962	Huntington National Bank Columbus, Ohio	LACQUA Discover Acct x1296 Carol Stream, Illinois	\$15,292.87
3	08/04/2015	CCM Operating Acct x6962	Huntington National Bank Columbus, Ohio	LACQUA Chase Acct x6584 Wilmington, Delaware	\$7,140.00
4	08/26/2015	CCM Operating Acct x6962	Huntington National Bank Columbus, Ohio	LACQUA Citibank Acct x9439 Louisville, Kentucky	\$18,150.00
5	04/04/2016	CCM Operating Acct x6962	Huntington National Bank Columbus, Ohio	LACQUA Discover Acct x1296 Carol Stream, Illinois	\$14,610.08
6	03/01/2017	CCM Operating Acct x6962	Huntington National Bank Columbus, Ohio	LACQUA Citibank Acct x9439 Louisville, Kentucky	\$16,076.10

All in violation of Title 18, United States Code, Section 1343.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.